

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARTHA E. KOPACZ,

Plaintiff,

v.

THE NCHERM GROUP, LLC d/b/a TNG and  
TNG Consulting; and Brett Sokolow,

Defendants.

No. 2:22-cv-04237

**STIPULATION TO STAY CASE DEADLINES PENDING MEDIATION**

Plaintiff Martha E. Kopacz and Defendants The NCHERM Group, LLC and Brett Sokolow (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate to stay case deadlines in this action, including Defendants’ deadline to respond to Plaintiff’s Amended Complaint, pending the Parties’ completion of private Mediation scheduled for February 16, 2023. In support thereof, the Parties state as follows:

1. Plaintiff filed a Complaint in this action on October 21, 2022.
2. Plaintiff filed an Amended Complaint on October 31, 2022.
3. The current deadline for Defendants to respond to Plaintiff’s Complaint is January 3, 2023. *See* ECF Docs. 6 and 7.
4. The Parties have engaged in discussions about potential resolution of Plaintiff’s claims in this matter.
5. The parties recently agreed to participate in private mediation to potentially resolve this matter and thereby avoid the burden and expense of litigation, including motion practice on Plaintiff’s Amended Complaint.

6. To that end, the Parties have scheduled private mediation to occur on February 16, 2023.

7. Given the Parties' commitment to attempt to resolve this matter through private mediation, the Parties request that the Court stay all case deadlines, including Defendants' deadline to respond to Plaintiff's Amended Complaint on January 3, 2023, pending completion of private mediation.

8. The Parties propose they report back to the Court on or before February 22, 2023, with a status report on the outcome of the mediation.

9. The Parties consent to use of electronic signatures on this Stipulation.

*s/ Ian M. Bryson*

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*Attorneys for Plaintiff*

Dated: December 20, 2022

*s/ Paul J. Sopher*

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*Attorneys for Defendant*

Dated: December 20, 2022

It is **FURTHER ORDERED** that, after the Parties have completed mediation and the case is not dismissed, Defendants shall have until February 24, 2023, to answer, move, or otherwise respond to Plaintiff's Amended Complaint. **No further extensions will be granted for this deadline.**

**SO ORDERED:**

/s/ Joshua D. Wolson

**JOSHUA D. WOLSON, J.**

Dated: December 21, 2022